



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

REGION I

5 POST OFFICE SQUARE, SUITE 100  
BOSTON, MASSACHUSETTS 02109-3912

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

**MAY 18 2018**

Town of Stratford  
Attn: Ms. Christina Senft-Batoh  
Conservation Administrator  
2725 Main Street  
Stratford, Connecticut 06615-5818

Re: PCB Cleanup and Disposal Approval under 40 CFR §§ 761.61(a) and (c) and  
§ 761.79(h)  
Former Center School  
Stratford, Connecticut

Dear Ms. Senft-Batoh:

This is in response to the Town of Stratford (the Town) Notification<sup>1</sup> for approval of a proposed plan to address PCB contamination located in the building known as the Former Center School (the Site) at 1000 East Broadway, Stratford, Connecticut. The Site contains PCB-contaminated materials that exceed the allowable PCB levels under 40 CFR § 761.20(a), § 761.61, and § 761.62. Specifically, PCBs have been found in caulk, glazing, mastic, paint, and in the adjacent exterior concrete slab.

In its Notification the Town has proposed the following PCB remediation plan:

- Remove PCB-contaminated building products (i.e., exterior grey concrete seam caulk, interior beige/spotted paint with adjacent CMU block wall, adjacent caulks and materials contaminated by the beige/spotted paint, interior black window glazing with window/door systems, green carpet adhesive, gym floor urethane, tan floor tile mastic, black floor mastic) and adjacent *porous surfaces* (i.e., one foot minimum of exterior concrete slab on either side of the caulk joint and subflooring coated by the urethane, and a minimum of 1/8 inch of concrete beneath mastic/glue), and dispose of as a *PCB bulk product waste* in accordance with 40 CFR § 761.62(b)

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<sup>1</sup> The Notification was prepared by Tighe & Bond, on behalf of the Town of Stratford to satisfy the requirements under 40 CFR § 761.61(a). Information was submitted dated June 30, 2017 (Self-Implementing Cleanup and Disposal Plan); January 5, 2018 (Response to EPA Comments and Revised Self-Implementing Cleanup and Disposal Plan); March 27, 2018 (Email response to EPA questions concerning disposal); April 25, 2018 (PCB Self-Implementing Clean-up and Disposal Plan Clarifications); May 4, 2018 (Email May 3, 2018 Figure1- Concrete floor verification samples); and, May 11, 2018 (Email clarification on soil samples). These submittals shall be referred to as the "Notification".

- Conduct verification sampling of the exterior concrete slab and adjacent soil following removal of the concrete slab section in accordance with 40 CFR 761 Subpart O, to confirm PCB concentrations are less than or equal to ( $\leq$ ) 1 ppm
- Conduct verification sampling of the interior concrete floor in accordance with the Figure 1 dated May 3, 2018 to confirm that the PCB cleanup standard of  $\leq$  1 ppm has been met

The Town has determined that certain non-liquid products (e.g., exterior white caulk (waste stream PCB-11) through white secondary interior paint (PCB waste stream 25) as shown in the table at Attachment 2), which have PCB concentrations at less than ( $<$ ) 50 ppm meet the criteria for an *Excluded PCB Product* under § 761.3. Under the PCB regulations at 40 CFR Part 761, there is no requirement for removal of these products or for decontamination of surfaces (e.g., window panes) that are in contact with the  $<$  50 ppm PCB products. The Town is proposing to remove and dispose of the  $>$  1 ppm but  $<$  50 ppm PCB products, prior to building demolition, in accordance with the Connecticut Department of Energy and Environmental Protection (CTDEEP) regulations.

Based on EPA's review, the information provided in the Notification meets the requirements under 40 CFR §§ 761.61, 761.62, and 761.79(h) for removal and disposal of *PCB bulk product waste* and for removal and/or decontamination of *PCB remediation waste*. Further, the proposed decontamination and disposal activities are consistent with the requirements and standards established under § 761.61(a), § 761.62, § 761.79 for similar types of PCB-contaminated materials.

With respect to the verification sampling frequency, based on the results of the PCB sampling to-date and the proposed cleanup and disposal approach, EPA has determined that the sampling plan and verification sampling frequency are adequate to confirm that PCB cleanup standard has been met. EPA finds that the alternate sampling frequency proposed by the Town will not create an unreasonable risk of injury to health or the environment when conducted in accordance with the Notification and this Approval. EPA may approve the sampling under § 761.61(c).

The Town may proceed with its project in accordance with 40 CFR §§ 761.61(a) and (c); § 761.79(h); its Notification; and, this Approval, subject to the conditions of Attachment 1.

Please note that if the PCBs in concrete and/or soil are determined to be  $>$  1 ppm, the Town will be required to notify EPA and discuss its proposed plan to comply with 40 CFR Part 761 for the Site. (See Attachment 1, Condition 13.b.ii and iv, respectively)

EPA encourages the compliance with greener cleanup practices for all cleanup projects, and recommends adherence to the ASTM Standard Guide to Greener Cleanups E2893-16 (Guide) for work conducted under this Approval and the Notification. Greener Cleanups is the practice of integrating options that minimize the environmental impacts of cleanup actions in order to incorporate practices that maximize environmental and human benefit. Please see Section 6 of the Guide for the Best Management Practices (BMP) Process dated May 2016 (See [www.astm.org/Standards/E2893.htm](http://www.astm.org/Standards/E2893.htm) for additional information). EPA encourages you to review the Guide and implement any practices that are feasible. If implemented, the PCB completion report (see Attachment 1, Condition 20) should include a section on BMP Documentation, as described in Section 6.6.5 of the Guide.



Questions and correspondence regarding this Approval should be directed to:

Kimberly N. Tisa, PCB Coordinator (OSRR07-2)  
United States Environmental Protection Agency  
5 Post Office Square, Suite 100  
Boston, Massachusetts 02109-3912  
Telephone: (617) 918-1527  
Facsimile: (617) 918-0527

EPA shall not consider this project complete until it has received all submittals required under this Approval. Please be aware that upon EPA receipt and review of the submittals, EPA may request any additional information necessary to establish that the work has been completed in accordance with 40 CFR Part 761, the Notification, and this Approval.

Sincerely,

A handwritten signature in black ink, appearing to read 'Bryan Olson', with a long horizontal flourish extending to the right.

Bryan Olson, Director  
Office of Site Remediation and Restoration

cc James Olsen, Tighe & Bond  
Gary Trombly, CTDEEP  
File

Attachment 1 – PCB Approval Conditions

Attachment 2 – PCB-Containing Building Materials Abatement (pages 13284-18, 13286-19 through 13286-24)

**ATTACHMENT 1:**

**PCB CLEANUP AND DISPOSAL APPROVAL CONDITIONS  
FORMER CENTER SCHOOL (the Site)  
1000 EAST BROADWAY  
STRATFORD, CONNECTICUT**

**GENERAL CONDITIONS**

1. This Approval is granted under the authority of Section 6(e) of the Toxic Substances Control Act (TSCA), 15 U.S.C. § 2605(e), and the PCB regulations at 40 CFR Part 761, and applies solely to the *PCB bulk product waste* and the *PCB remediation waste* located at the Site and identified in the Notification.
  - a. If the Town of Stratford (the Town) identifies other PCB-contaminated material or soil not described in the Notification which is subject to cleanup and disposal under the PCB regulations, it will be required to notify EPA and clean up such PCB-contaminated building material or soil in accordance with 40 CFR Part 761.
  - b. The Town may submit a separate plan to address such PCB contamination not identified in the Notification or may modify the Notification to incorporate cleanup of such PCBs under this Approval in accordance with Condition 16.
2. The Town shall conduct on-site activities in accordance with the conditions of this Approval and with the Notification.
3. In the event that the cleanup plan described in the Notification differs from the conditions specified in this Approval, the conditions of this Approval shall govern.
4. The terms and abbreviations used herein shall have the meanings as defined in 40 CFR § 761.3 unless otherwise defined within this Approval.
5. The Town must comply with all applicable federal, state and local regulations in the storage, handling, and disposal of all PCB wastes, including PCBs, PCB Items and decontamination wastes generated under this Approval. In the event of a new spill during response actions, the Town shall contact EPA within 24 hours for direction on PCB cleanup and sampling requirements.
6. The Town is responsible for the actions of all officers, employees, agents, contractors, subcontractors, and others who are involved in activities conducted under this Approval. If at any time the Town has or receives information indicating that the Town or any other person has failed, or may have failed, to comply with any provision of this Approval, it must report the information to EPA in writing within 24 hours of having or receiving the information.

7. This Approval does not constitute a determination by EPA that the transporters or disposal facilities selected by the Town are authorized to conduct the activities set forth in the Notification. The Town is responsible for ensuring that its selected transporters and disposal facilities are authorized to conduct these activities in accordance with all applicable federal, state and local statutes and regulations.
8. This Approval does not: 1) waive or compromise EPA's enforcement and regulatory authority; 2) release the Town from compliance with any applicable requirements of federal, state or local law; or 3) release the Town from liability for, or otherwise resolve any violations of federal, state or local law.
9. Failure to comply with the Approval conditions specified herein shall constitute a violation of the requirement in § 761.50(a) to store or dispose of PCB waste in accordance with 40 CFR Part 761 Subpart D.

#### **NOTIFICATION AND CERTIFICATION CONDITIONS**

10. This Approval may be revoked if the EPA does not receive written notification from the Town of its acceptance of the conditions of this Approval within 10 business days of receipt.
11. The Town shall submit the following information to EPA:
  - a. a certification signed by its selected abatement/demolition contractor, stating that the contractor(s) has read and understands the Notification, and agrees to abide by the conditions specified in this Approval; and,
  - b. a certification signed by the selected analytical laboratory, stating that the laboratory has read and understands the extraction and analytical method requirements and quality assurance requirements specified in the Notification and in this Approval.

#### **CLEANUP AND DISPOSAL CONDITIONS**

12. To the maximum extent practical, engineering controls, such as barriers, and removal techniques, such as the use of HEPA ventilated tools, shall be utilized during removal processes. In addition, to the maximum extent possible, disposable equipment and materials, including PPE, will be used to reduce the amount of decontamination necessary.



13. PCB-contaminated materials associated with the building demolition project shall be decontaminated and verification sampling and analysis shall be conducted as described below:
- a. All visible residues of PCB caulk, glazing, paint, urethane and mastic with greater than or equal to ( $\geq$ ) 50 ppm PCBs and adjacent *porous surfaces* with PCB concentrations greater than ( $>$ ) 1 ppm shall be removed and disposed of as a *PCB bulk product waste* in accordance with 40 CFR § 761.62 and as described in the Notification.
  - b. The decontamination standard for building *porous surfaces* (i.e., exterior concrete slab and interior concrete floor slab) shall be less than or equal to ( $\leq$ ) 1 ppm.
    - i) Sampling for *porous surfaces* shall be performed on a bulk basis (i.e., mg/kg) and reported on a dry weight analysis. Sampling for *porous surfaces* shall be conducted in accordance with the EPA Region 1 *Standard Operating Procedure for Sampling Porous Surfaces for Polychlorinated Biphenyls (PCBs) Revision 4, May 5, 2011*, at a maximum depth interval of 0.5 inches. Verification samples shall be collected in accordance with 40 CFR 761 Subpart O for the exterior concrete slab, and the May 4, 2018 (Email May 3, 2018 Figure 1-Concrete floor verification samples) for the interior concrete floor slab.
    - ii) If the concrete verification samples exceed the  $> 1$  ppm PCB cleanup standard, the Town shall notify EPA and discuss proposed activities to meet the cleanup standard.
    - iii) Soil verification samples where the section of the exterior concrete slab is removed shall be collected on a bulk basis (i.e., mg/Kg) and in accordance with 40 CFR Part 761 Subpart O, to confirm that all  $> 1$  ppm PCBs have been removed. Samples shall be collected from both excavation bottoms and sidewalls.
    - iv) If the soil verification samples exceed the  $> 1$  ppm PCB cleanup standard, the Town shall notify EPA and discuss proposed activities to meet the cleanup standard.
    - v) Chemical extraction for PCBs shall be conducted using Methods 3500B/3540C of SW-846; and, chemical analysis for PCBs shall be conducted using Method 8082 of SW-846, unless another extraction/analytical method(s) is validated according to Subpart Q.

14. PCB waste (at any concentration) generated as a result of the activities described in the Notification, excluding any decontaminated materials, shall be marked in accordance with 40 CFR § 761.40; stored in a manner consistent with 40 CFR § 761.65; and, disposed of in accordance with 40 CFR § 761.61 or § 761.62, unless otherwise specified below.
  - a. Decontamination wastes and residues shall be disposed of in accordance with 40 CFR § 761.79(g)(6).
  - b. Moveable equipment, tools, and sampling equipment shall be decontaminated in accordance with either 40 CFR § 761.79(b)(3)(i)(A), § 761.79(b)(3)(ii)(A), or § 761.79(c)(2).
  - c. PCB-contaminated water generated during decontamination shall be decontaminated in accordance with 40 CFR § 761.79(b)(1) or disposed of under § 761.60.

#### **INSPECTION, MODIFICATION AND REVOCATION CONDITIONS**

15. The Town shall allow any authorized representative of the Administrator of the EPA to inspect the Site and to inspect records and take samples as may be necessary to determine compliance with the PCB regulations and this Approval. Any refusal by the Town to allow such an inspection (as authorized by Section 11 of TSCA) shall be grounds for revocation of this Approval.
16. Any proposed modification(s) in the plan, specifications, or information in the Notification must be submitted to EPA no less than 14 calendar days prior to the proposed implementation of the change. Such proposed modifications will be subject to the procedures of 40 CFR § 761.61(a)(3)(ii).
17. If such modification involves a change in the cleanup levels or in the use of the Site which results in exposures not considered in the Notification, the EPA may revoke, suspend, and/or modify this Approval upon finding that this risk-based cleanup and disposal action may pose an unreasonable risk of injury to health or the environment due to the change in use. EPA may take similar action if the EPA does not receive requested information needed from the Town to make a determination regarding potential risk.
18. Any misrepresentation or omission of any material fact in the Notification or in any records or reports may result in the EPA's revocation, suspension and/or modification of the Approval, in addition to any other legal or equitable relief or remedy the EPA may choose to pursue.



**RECORDKEEPING AND REPORTING CONDITIONS**

19. The Town shall prepare and maintain all records and documents required by 40 CFR Part 761, including but not limited to the records required under Subparts J and K. A written record of the cleanup and disposal and the analytical sampling shall be established and maintained by the Town in one centralized location, until EPA approves in writing a request for an alternative disposition of such records. All records shall be made available for inspection to authorized representatives of EPA.
20. The Town shall submit a final completion report in both a hard copy and electronic version (e.g., CD-ROM), to the EPA within 60 days of completion of the activities authorized under this Approval. At a minimum, this final report shall include: a short narrative of the project activities with photographic documentation and Greener Cleanups BMP documentation, if implemented; characterization and confirmation sampling analytical results; copies of the accompanying analytical chains of custody; field and laboratory quality control/quality assurance checks; an estimate of the quantity of PCB waste disposed of; copies of manifests and bills of lading; copies of certificates of disposal or similar certifications issued by the disposer; and, the estimated cost of the remediation work authorized under the Approval.
21. Required submittals shall be mailed to:  
  
Kimberly N. Tisa, PCB Coordinator  
United States Environmental Protection Agency  
5 Post Office Square, Suite 100 – (OSRR07-2)  
Boston, Massachusetts 02109-3912  
Telephone: (617) 918-1527  
Facsimile: (617) 918-0527
22. No record, report or communication required under this Approval shall qualify as a self-audit or voluntary disclosure under EPA audit, self-disclosure or penalty policies.

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**END OF ATTACHMENT 1**